

SHER TREMONTE LLP

February 10, 2022

BY ECF

The Honorable Jed S. Rakoff
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States v. Absar Haaris*, 16-CR-756 (JSR)

Dear Judge Rakoff:

We write on behalf of our client, Absar Haaris, with the consent of the Government, to respectfully request early termination of Mr. Haaris's supervised release. On February 9, 2022, the Court granted leave in a telephone conference to file this request by letter.

As Your Honor knows, on November 15, 2019, Mr. Haaris was sentenced, pursuant to U.S.S.G. § 5K1.1, to time served, three years' supervised release, and 100 hours of per year of community service. At the time of sentencing, Mr. Haaris had already been on pretrial supervision for over three years. On September 3, 2020, the Court imposed a restitution order in the amount of \$544,331.51, payable jointly and severally with the defendants in *United States v. Asim Hameedi, et al.*, No. 17-CR-137 (JGK).

Since the Court imposed sentence in this case, Mr. Haaris has served 27 of the 36 months imposed on supervised release. He has complied with all the terms of his supervision, including completing the mandated 300 hours of community service. In addition, although the *Hameedi* matter resulted in convictions of three of the defendants (out of five charged) with whom Mr. Haaris could have shared the restitution obligation, he and Asim Hameedi made arrangements to split the obligation among the two of them and paid it in full in September of last year. Accordingly, the Government has been made whole and Mr. Haaris has fulfilled all of the requirements relating to his conviction, other than completing the last nine months of supervised release.

Mr. Haaris respectfully requests that the Court grant early termination not just in recognition of the foregoing, but also allow Mr. Haaris to continue to focus on growing the business he has developed since the commencement of this matter, which ended Mr. Haaris's medical career. Since that time, he has productively engaged in renovating residential rental properties in the Albany area. He would like to expand his business out

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of state, but that effort is hindered by the need to clear in advance any out-of-state travel with his probation officer. Mr. Haaris's work in real estate development has been central to his rehabilitation and necessary for him to support his family, which includes a son with special needs.

Accordingly, for the foregoing reasons, we respectfully request that the Court grant early termination of supervised release. We have discussed this matter with AUSA Kristy Greenberg, who has advised that the Government consents to early termination.

Respectfully submitted,

/s/_____
Michael Tremonte
Noam Biale
SHER TREMONTE LLP

Attorneys for Absar Haaris

cc: All counsel (via ECF)